

UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

IN RE GOOGLE INC. COOKIE)	Case No. 12-MD-2358 (SLR)
PLACEMENT CONSUMER PRIVACY)	
LITIGATION)	
_____)	

DECLARATION OF AMANDA STERNBERG REGARDING SETTLEMENT

ADMINISTRATION

I, AMANDA STERNBERG, declare as follows:

INTRODUCTION

1. I am a Senior Project Manager for Epiq Class Action & Claims Solutions, Inc. (“Epiq”).¹
2. The following statements are based on my personal knowledge and information provided by other Epiq employees working under my supervision, and if called on to do so, I could and would testify competently about these issues.
3. A previous declaration was submitted discussing the settlement administration. Attached hereto as **Exhibit 1** is a copy of the Declaration of Stephen J. Ciriame dated December 5, 2016.
4. I submit this Supplemental Declaration in order to advise the Parties and the Court as to final Exclusion and Notification reach totals.

NOTICE

5. Pursuant to paragraph 7 of the Preliminary Approval Order, Epiq designed and conducted a nationwide publication website-based notice program using banner notices targeted to Apple Safari and Microsoft Internet Explorer web browser users in English and Spanish with a link to the Long-Form Notice. For a period of (6) six weeks, beginning on September 12, 2016, and continuing until October 24, 2016, the notice of the proposed settlement was disseminated to potential members of the Class via online advertisements on the Audience Network and Pulpo

¹ Garden City Group, LLC was acquired by Epiq on June 15, 2018 and is now continuing operations as part of Epiq.

Media networks, as well as through targeted social media advertising on Facebook. A total of 275,361,445 impressions were served by the banner advertisements during this time period.

6. The Audience Network covers over 84% of the total U.S. internet population including websites from comScore's top 1,000 websites ranked by page views/traffic. Advertising has the opportunity to run on over 3 million websites including AOL.com, ABCFamily.go.com, CafeMom.com, FoodNetwork.com, MSN.com, WSJ.com, Weather.com, People.com, BHG.com, Pandora.com, ABCNews.go.com, AllYou.com, Prevention.com and Shape.com, among others.

7. Pulpo Media is a bi-language network including thousands of Spanish language websites. Pulpo Media is ranked by comScore Media Metrix as #1 in Hispanic Reach based on its Hispanic Ad Focus Hispanic Ad Focus (#1 Spanish Dominant, Bilingual, and English dominant Hispanics respectively). Ads may appear on such sites as Espanol.Weather.com, Hoy.es, and Univision.com, among others.

8. Facebook is the number one social networking site on the web with over 1.55 billion monthly active users worldwide and over 1 billion people logging in daily.

9. Epiq also published the Summary Notice in the October 17, 2016 issue of *People* Magazine, appearing on page 57. *People* is a national weekly magazine with broad circulation of 3.5 million and a readership of over 42 million. The Summary Notice contained the material terms of the Settlement to potential Class Members, including the relief provided under the Settlement, the date, time, and place of the fairness hearing, the procedures and deadlines for opting-out of the Settlement or submitting objections to the Settlement, and an explanation that Class Members would be bound by any final judgement in this case if they did not opt-out of the Settlement.

SETTLEMENT WEBSITE

10. Pursuant to paragraph 7 of the Preliminary Approval Order, Epiq designed and made public on September 12, 2016, a Settlement Website, <http://cases.gcginc.com/ggl>, which contained the Long-Form Notice. The Long-Form Notice contained the material terms of the Settlement to potential Class Members, including the relief provided under the Settlement, the date, time, and place of the fairness hearing, the procedures and deadlines for opting-out of the Settlement or submitting objections to the Settlement, and an explanation that Class Members would be bound by any final judgement in this case if they did not opt-out of the Settlement. Through this Settlement Website, Class Members were able to download the Request For Exclusion Form. As of December 30, 2019, the Settlement Website has received 568,891 visits.

EXCLUSIONS

11. Pursuant to Sections 8.1-8.3 of the Agreement, any Class Member may have sought to be excluded from the Settlement by submitting to the Settlement Administrator the Request for Exclusion Form postmarked by November 27, 2016. As of December 30, 2019, Epiq received 50 timely requests for exclusion and 11 untimely requests (the latest received exclusion request was dated February 10, 2017). A list of all persons who have submitted a request for exclusion is attached hereto as **Exhibit 2**.

OBJECTIONS

12. Pursuant to Sections 9.1-9.4 of the Agreement, any Class Member who wished to object to the Settlement had to file their reasons for objecting with the Clerk of the Court, Counsel, and the Settlement Administrator on or before December 21, 2016. As of December 30, 2019, Epiq has not received any objections.

CLASS COMMUNICATION

13. Epiq received limited communications with Class Members aside from processing mailed Request for Exclusion Forms, however Epiq did receive a phone call from a Class Member interested in knowing which charities were to benefit from the Settlement and whether they would could suggest a charity to be a beneficiary.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed this 30th day of December, 2019 in Seattle, Washington.


AMANDA STERNBERG

EXHIBIT 1

**UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE**

IN RE GOOGLE INC. COOKIE)	Case No. 12-MD-2358 (SLR)
PLACEMENT CONSUMER PRIVACY)	
LITIGATION)	
_____)	

**DECLARATION OF STEPHEN J. CIRAMI
REGARDING SETTLEMENT ADMINISTRATION**

I, STEPHEN J. CIRAMI, declare as follows:

INTRODUCTION

1. I am the Executive Vice President and Chief Operating Officer of the Garden City Group, LLC (“GCG”). Over the past 13 years at GCG, I have handled a wide range of historic complex legal administrations, including mass tort settlements, human rights administrations, product liability settlements, antitrust matters, DOJ disgorgements, SEC Fair Funds, and ERISA, wage and hour, and insurance-related matters. I have particular expertise identifying solutions for cases involving high volume and inaccurate or dated data, and those requiring specialized class member identification demands.

2. The following statements are based on my personal knowledge and information provided by other GCG employees working under my supervision, and if called on to do so, I could and would testify competently about these issues.

3. GCG was retained as the Settlement Administrator pursuant to Section 2.29 of the Settlement Agreement and Release (the “Agreement”)¹, which the Court preliminarily approved in its Order Granting Motion for Preliminary Approval of Class Action Settlement dated August 31, 2016 (“Preliminary Approval Order”).

¹ Unless otherwise defined herein, all capitalized terms shall have the same meaning as set forth in the Agreement.

4. I submit this Declaration in order to advise the Parties and the Court as to compliance with the notice procedures as set forth in the Agreement and Preliminary Approval Order.

CAFA NOTICE

5. Pursuant to Section 7.4 of the Agreement, notice of the proposed settlement pursuant to the Class Action Fairness Act 28 U.S.C. §1715(b) (“CAFA Notice”) was to be sent within ten days of the Preliminary Approval Motion. On September 8, 2016, GCG served CAFA Notice and an accompanying CD containing the documents specified by 28 U.S.C. §1715(b)(1)-(8) to the Attorney General of the United States and to the state Attorney Generals identified in the Service List for the CAFA Notice. Attached hereto as **Exhibit A** is a copy of the CAFA Notice cover letter and Service List. GCG sent the CAFA Notice cover letter and accompanying CD by Federal Express overnight delivery service and confirmed delivery for each addressee. The delivery confirmation sheet is attached hereto as **Exhibit B**.

ONLINE PUBLICATION NOTICE

6. Pursuant to paragraph 7 of the Preliminary Approval Order, GCG designed and conducted a nationwide publication website-based notice program using banner notices targeted to Apple Safari and Microsoft Internet Explorer web browser users in English and Spanish with a link to the Long-Form Notice. For a period of (6) six weeks, beginning on September 12, 2016, and continuing until October 24, 2016, the notice of the proposed settlement was disseminated to potential members of the Class via online advertisements on the Audience Network and Pulpo Media networks, as well as through targeted social media advertising on Facebook. A total of 275,361,445 impressions were served by the banner advertisements during this time period. Screenshots of the banner advertisements as they appeared are attached hereto as **Exhibit C**.

7. The Audience Network covers over 84% of the total U.S. internet population including websites from comScore's top 1,000 websites ranked by page views/traffic. Advertising has the opportunity to run on over 3 million websites including AOL.com, ABCFamily.go.com, CafeMom.com, FoodNetwork.com, MSN.com, WSJ.com, Weather.com, People.com, BHG.com, Pandora.com, ABCNews.go.com, AllYou.com, Prevention.com and Shape.com, among others.

8. Pulpo Media is a bi-language network including thousands of Spanish language websites. Pulpo Media is ranked by comScore Media Metrix as #1 in Hispanic Reach based on its Hispanic Ad Focus Hispanic Ad Focus (#1 Spanish Dominant, Bilingual, and English dominant

Hispanics respectively). Ads may appear on such sites as Espanol.Weather.com, Hoy.es, and Univision.com, among others.

9. Facebook is the number one social networking site on the web with over 1.55 billion monthly active users worldwide and over 1 billion people logging in daily.

PRINT PUBLICATION NOTICE

10. Pursuant to paragraph 7 of the Preliminary Approval Order, GCG published the Summary Notice in the October 17, 2016 issue of *People* Magazine, appearing on page 57. *People* is a national weekly magazine with broad circulation of 3.5 million and a readership of over 42 million. The Summary Notice contained the material terms of the Settlement to potential Class Members, including the relief provided under the Settlement, the date, time, and place of the fairness hearing, the procedures and deadlines for opting-out of the Settlement or submitting objections to the Settlement, and an explanation that Class Members would be bound by any final judgement in this case if they did not opt-out of the Settlement. A copy the *People* Magazine cover and the Summary Notice included therein are attached hereto as **Exhibit D**.

SETTLEMENT WEBSITE

11. Pursuant to paragraph 7 of the Preliminary Approval Order, GCG designed and made public on September 12, 2016, a Settlement Website, <http://cases.gcginc.com/ggl>, which contained the Long-Form Notice. The Long-Form Notice contained the material terms of the Settlement to potential Class Members, including the relief provided under the Settlement, the date, time, and place of the fairness hearing, the procedures and deadlines for opting-out of the Settlement or submitting objections to the Settlement, and an explanation that Class Members would be bound by any final judgement in this case if they did not opt-out of the Settlement. A copy of the Long-Form Notice is attached hereto as **Exhibit E**. Through this Settlement Website, Class Members were also able to download the Request For Exclusion Form, attached hereto as **Exhibit F**. As of December 4, 2016, the Settlement Website has received 44,415 visits.

EXCLUSIONS

12. Pursuant to Sections 8.1-8.3 of the Agreement, any Class Member may have sought to be excluded from the Settlement by submitting to the Settlement Administrator the Request for Exclusion Form, (see Exhibit F), postmarked by November 27, 2016. As of December 4, 2016, GCG has received 50 timely requests for exclusion and 1 (one) untimely


request. A list of all persons who have submitted a request for exclusion is attached hereto as **Exhibit G**.

OBJECTIONS

13. Pursuant to Sections 9.1-9.4 of the Agreement, any Class Member who wishes to object to the Settlement has to file their reasons for objecting with the Clerk of the Court, Counsel, and the Settlement Administrator on or before December 21, 2016. Any objection must state the Class Member's full name, address, telephone number, information demonstrating that the Class Member is entitled to be included as a member of the Class, and reasons for his or her objection. As of December 4, 2016, GCG has not received any objections.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed this 5th day of December, 2016 in New York, New York.



STEPHEN J. CIRAMI

EXHIBIT A



888-404-8013 | gardencitygroup.com
1531 Utah Avenue S., Suite 600, Seattle, WA 98134

September 8, 2016.

VIA FEDERAL EXPRESS

United States Attorney General
And State Officials Identified
in the Attached Exhibit A

Re: CAFA Notice of Proposed Class Action Settlement
In re Google Inc. Cookie Placement Consumer Privacy Litigation
Case No. 12-md-2358 (SLR)

Dear Sir or Madam:

In compliance with the Class Action Fairness Act of 2005 ("CAFA"), 28 U.S.C. § 1715, the Garden City Group, LLC ("GCG") on behalf of Defendant Google Inc., provides this notice relating to the proposed settlement of the lawsuit entitled *In re Google Inc. Cookie Placement Consumer Privacy Litigation*, United States District Court for the District of Delaware, Case No. 12-MD-2358 (SLR).

On August 29, 2016, the Plaintiff's Motion for Preliminary Approval of Class Action Settlement; Brief in Support was filed with the Court. The Court issued its Order Granting Motion for Preliminary Approval of Class Action Settlement on August 31, 2016. The Final Approval Hearing is currently scheduled for January 11, 2017 at 1:00 p.m.

In accordance with CAFA, please find enclosed a CD containing copies of the following documents:

1. Consolidated Class Action Complaint (Docket 46);
2. Defendant Google Inc.'s Answer to the Consolidated Amended Complaint (Docket 154);
3. Consolidated Amended Class Action Complaint (Docket 162);
4. Plaintiff's Motion for Preliminary Approval of Class Action Settlement; Brief in Support (Docket 163);
 - a. Declaration of Brian R. Strange in Support of Motion for Preliminary Approval of Class Action Settlement (Docket 163-1) including Exhibits;



- b. Declaration of Stephen G. Grygiel in Support of Motion for Preliminary Approval of Class Action Settlement (Docket 163-2);
- c. Declaration of James P. Frickleton in Support of Motion for Preliminary Approval of Class Action Settlement (163-3);
- d. Declaration of Stephen J. Cirami Regarding Notice and Settlement Administration (Docket 163-4);
- e. [Proposed] Order Granting Preliminary Approval of Class Action Settlement (Docket 163-5);

5. Order Granting Preliminary Approval of Class Action Settlement (Docket 164)

These documents are also available online via the federal Public Access to Court Electronic Records ("PACER") system, available at <http://www.pacer.gov/>.

It is not feasible at this time to provide the names of class members who reside in each State or a reasonably accurate estimate of the proportionate share of the claims of such members to the entire settlement. A settlement class member is anyone in the United States of America who used the Apple Safari or Microsoft Internet Explorer web browsers and who visited a website from which Doubleclick.net (Google's advertising serving service) cookies were placed by the means alleged in the Complaint.

Defendant is represented by Michael H. Rubin and Anthony J Weibell of Wilson Sonsini Goodrich & Rosati. Please feel free to contact Mr. Rubin or Mr. Weibell directly at Wilson Sonsini Goodrich & Rosati, 650 Page Mill Road, Palo Alto, CA 94304 with any questions.

Best regards,

Robert Jindra
Assistant Director, Operations
GCG
1531 Utah Ave South, Suite 600
Seattle, WA 98134
1-888-404-8013

Enclosures

cc: Counsel for Defendants
Class Counsel

US Attorney General
US Department of Justice
950 Pennsylvania Ave NW
Washington, DC 20530

Attorney General for Alaska
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Attorney General for Alabama
501 Washington Avenue
Montgomery, AL 36104

Attorney General for Arkansas
323 Center St., Suite 200
Little Rock, AR 72201

Attorney General for Arizona
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Phoenix, AZ 85007

CAFA Coordinator
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Consumer Law Section
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Attorney General for DC
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Attorney General for Indiana
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302 W. Washington St, 5th Floor
Indianapolis, IN 46204

Attorney General for Kansas
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Attorney General for Michigan
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Lansing, MI 48909

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445 Minnesota St.
St. Paul, MN 55101

Attorney General for Missouri
Supreme Court Building
207 W High St.
Jefferson City, MO 65101

Attorney General for Mississippi
Walter Sillers Bldg.
550 High St., Ste. 1200
Jackson, MS 39201

Attorney General for Montana
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Attorney General for North Carolina
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Raleigh, NC 27603

Attorney General for North Dakota
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Attorney General for New Jersey
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Trenton, NJ 08625

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Villagra Bldg.
Santa Fe, NM 87501

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Carson City, NV 89701

Attorney General for New York
The Capitol
Albany, NY 12224

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Attorney General for Oregon
Oregon Department of Justice
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Columbia, SC 29201

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Attorney General for Tennessee
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Federated States of Micronesia
PO Box PS 105, Palikir
Pohnpei, FM 96941

Attorney General for the
Republic of the Marshall Islands
PO Box 890
Majuro, MH 96960

EXHIBIT B

Carrier	Tracking No. or Nickname	Shipper city, state	Ship (P/U) date	Status	Recipient city, state	Delivery date	Signature image
FedEx	682222383067	Seattle, WA	9/8/2016	Delivered	Washington, DC	9/9/2016 9:56	YES
FedEx	682222383078	Seattle, WA	9/8/2016	Delivered	Anchorage, AK	9/9/2016 10:23	YES
FedEx	682222383089	Seattle, WA	9/8/2016	Delivered	Montgomery, AL	9/9/2016 9:51	YES
FedEx	682222383090	Seattle, WA	9/8/2016	Delivered	Little Rock, AR	9/9/2016 10:00	YES
FedEx	682222383104	Seattle, WA	9/8/2016	Delivered	Phoenix, AZ	9/9/2016 10:04	YES
FedEx	682222383115	Seattle, WA	9/8/2016	Delivered	San Francisco, CA	9/9/2016 9:31	YES
FedEx	682222383126	Seattle, WA	9/8/2016	Delivered	Denver, CO	9/9/2016 10:21	YES
FedEx	682222383137	Seattle, WA	9/8/2016	Delivered	Hartford, CT	9/9/2016 9:37	YES
FedEx	682222383148	Seattle, WA	9/8/2016	Delivered	Washington, DC	9/9/2016 9:11	YES
FedEx	682222383159	Seattle, WA	9/8/2016	Delivered	Wilmington, DE	9/9/2016 13:55	YES
FedEx	682222383160	Seattle, WA	9/8/2016	Delivered	Tallahassee, FL	9/9/2016 9:22	YES
FedEx	682222383170	Seattle, WA	9/8/2016	Delivered	Atlanta, GA	9/9/2016 8:48	YES
FedEx	682222383181	Seattle, WA	9/8/2016	Delivered	Honolulu, HI	9/9/2016 11:56	YES
FedEx	682222383192	Seattle, WA	9/8/2016	Delivered	Des Moines, IA	9/9/2016 11:43	YES
FedEx	682222383207	Seattle, WA	9/8/2016	Delivered	Boise, ID	9/9/2016 10:15	YES
FedEx	682222383218	Seattle, WA	9/8/2016	Delivered	Springfield, IL	9/9/2016 9:22	YES
FedEx	682222383229	Seattle, WA	9/8/2016	Delivered	Indianapolis, IN	9/9/2016 10:10	YES
FedEx	682222383230	Seattle, WA	9/8/2016	Delivered	Topeka, KS	9/9/2016 9:12	YES
FedEx	682222383240	Seattle, WA	9/8/2016	Delivered	Frankfort, KY	9/9/2016 11:00	YES
FedEx	682222383251	Seattle, WA	9/8/2016	Delivered	Baton Rouge, LA	9/9/2016 11:28	YES
FedEx	682222383262	Seattle, WA	9/8/2016	Delivered	Boston, MA	9/9/2016 10:30	YES
FedEx	682222383273	Seattle, WA	9/8/2016	Delivered	Baltimore, MD	9/9/2016 13:51	YES
FedEx	682222383284	Seattle, WA	9/8/2016	Delivered	Augusta, ME	9/9/2016 10:05	YES
FedEx	682222383295	Seattle, WA	9/8/2016	Delivered	Lansing, MI	9/9/2016 10:02	YES
FedEx	682222383300	Seattle, WA	9/8/2016	Delivered	St. Paul, MN	9/9/2016 9:08	YES
FedEx	682222383310	Seattle, WA	9/8/2016	Delivered	Jefferson City, MO	9/9/2016 9:32	YES
FedEx	682222383321	Seattle, WA	9/8/2016	Delivered	Jackson, MS	9/9/2016 8:51	YES
FedEx	682222383332	Seattle, WA	9/8/2016	Delivered	Helena, MT	9/9/2016 10:57	YES
FedEx	682222383343	Seattle, WA	9/8/2016	Delivered	Raleigh, NC	9/9/2016 9:55	YES
FedEx	682222383354	Seattle, WA	9/8/2016	Delivered	Bismarck, ND	9/9/2016 10:46	YES
FedEx	682222383365	Seattle, WA	9/8/2016	Delivered	Lincoln, NE	9/9/2016 8:41	YES
FedEx	682222383376	Seattle, WA	9/8/2016	Delivered	Concord, NH	9/9/2016 10:04	YES
FedEx	682222383387	Seattle, WA	9/8/2016	Delivered	Trenton, NJ	9/9/2016 10:08	YES

Carrier	Tracking No. or Nickname	Shipper city, state	Ship (P/U) date	Status	Recipient city, state	Delivery date	Signature image
FedEx	682222383398	Seattle, WA	9/8/2016	Delivered	Santa Fe, NM	9/9/2016 10:01	YES
FedEx	682222383402	Seattle, WA	9/8/2016	Delivered	Carson City, NV	9/9/2016 9:48	YES
FedEx	682222383413	Seattle, WA	9/8/2016	Delivered	Albany, NY	9/9/2016 9:29	YES
FedEx	682222383424	Seattle, WA	9/8/2016	Delivered	Columbus, OH	9/9/2016 10:27	YES
FedEx	682222383435	Seattle, WA	9/8/2016	Delivered	Oklahoma City, OK	9/9/2016 9:36	YES
FedEx	682222383446	Seattle, WA	9/8/2016	Delivered	Salem, OR	9/9/2016 9:10	YES
FedEx	682222383457	Seattle, WA	9/8/2016	Delivered	Harrisburg, PA	9/9/2016 9:48	YES
FedEx	682222383468	Seattle, WA	9/8/2016	Delivered	Providence, RI	9/9/2016 9:23	YES
FedEx	682222383479	Seattle, WA	9/8/2016	Delivered	Columbia, SC	9/9/2016 8:52	YES
FedEx	682222383480	Seattle, WA	9/8/2016	Delivered	Pierre, SD	9/9/2016 10:09	YES
FedEx	682222383490	Seattle, WA	9/8/2016	Delivered	Nashville, TN	9/9/2016 11:59	YES
FedEx	682222383505	Seattle, WA	9/8/2016	Delivered	Austin, TX	9/9/2016 9:48	YES
FedEx	682222383516	Seattle, WA	9/8/2016	Delivered	Salt Lake City, UT	9/9/2016 10:12	YES
FedEx	682222383527	Seattle, WA	9/8/2016	Delivered	Richmond, VA	9/9/2016 9:39	YES
FedEx	682222383538	Seattle, WA	9/8/2016	Delivered	Montpelier, VT	9/9/2016 10:04	YES
FedEx	682222383549	Seattle, WA	9/8/2016	Delivered	Olympia, WA	9/9/2016 10:47	YES
FedEx	682222383550	Seattle, WA	9/8/2016	Delivered	Madison, WI	9/9/2016 9:51	YES
FedEx	682222383560	Seattle, WA	9/8/2016	Delivered	Charleston, WV	9/9/2016 9:10	YES
FedEx	682222383571	Seattle, WA	9/8/2016	Delivered	Cheyenne, WY	9/9/2016 9:58	YES
FedEx	682222383582	SEATTLE, WA	9/8/2016	Delivered	PAGO PAGO	9/19/2016 12:54	NO
FedEx	682222383593	SEATTLE, WA	9/8/2016	Delivered	TAMUNING, GU	9/12/2016 8:39	YES
FedEx	682222383608	SEATTLE, WA	9/8/2016	Delivered	SAN JUAN, PR	9/9/2016 13:58	NO
FedEx	682222383619	SEATTLE, WA	9/8/2016	Delivered	ST. THOMAS	9/9/2016 13:32	YES
USPS	9470112699350005623923	SEATTLE, WA	9/9/2016	Delivered	Saipan, MP	9/16/2016	NO
USPS	9470112699350005623947	SEATTLE, WA	9/10/2016	Delivered	Koror, PW	9/19/2016	NO
USPS	9470112699350005623916	SEATTLE, WA	9/11/2016	Delivered	Pohnpei, FM	9/13/2016	NO
USPS	9470112699350005623930	SEATTLE, WA	9/12/2016	Delivered	Majuro, MH	9/14/2016	NO

EXHIBIT C

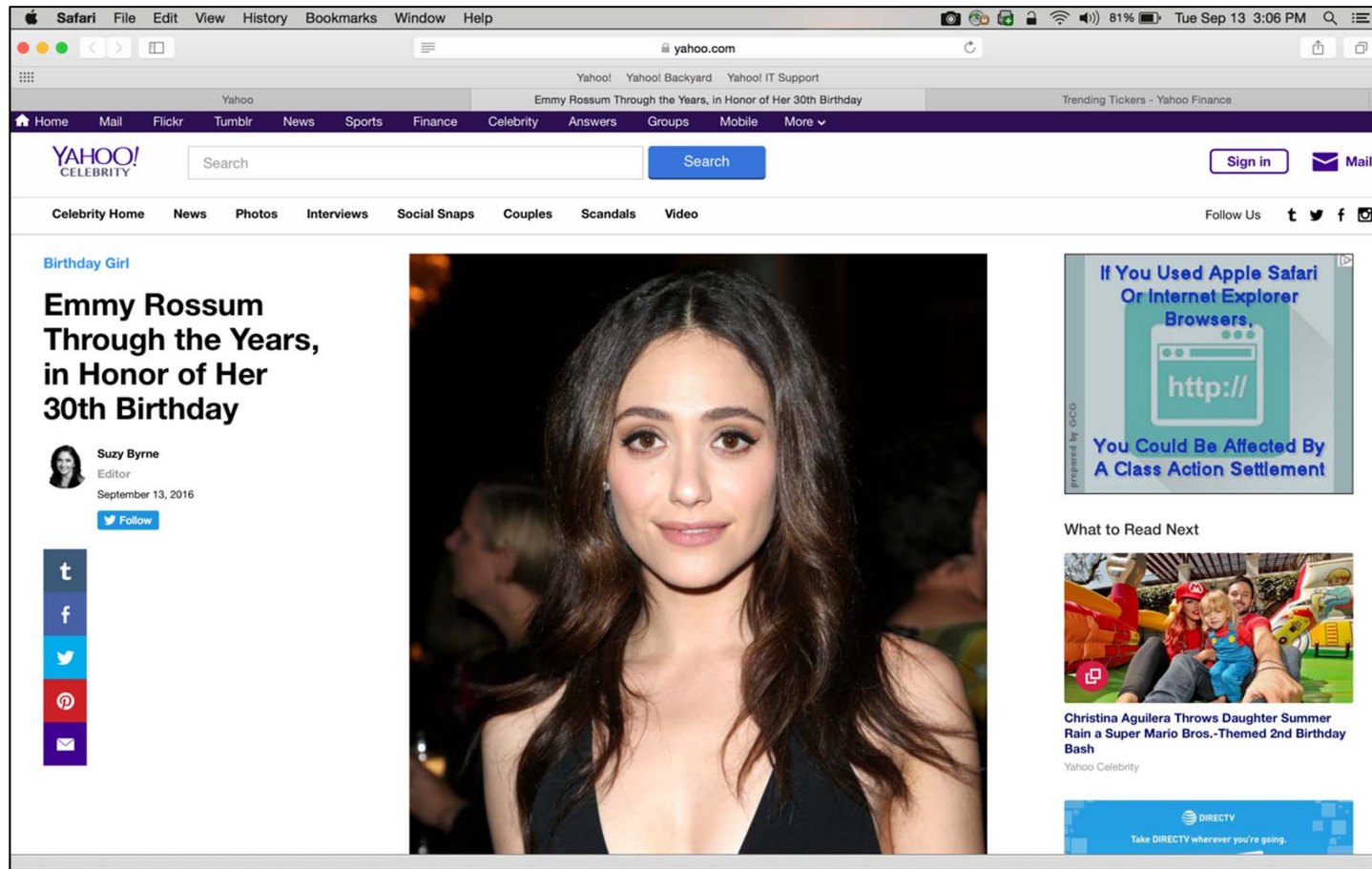
Yahoo Ad Network / A18+ / 728x90


The screenshot displays the Yahoo Finance homepage in a Safari browser window. The address bar shows 'finance.yahoo.com'. The page features a navigation bar with links to Home, Mail, Flickr, Tumblr, News, Sports, Finance, Celebrity, Answers, Groups, Mobile, and More. A search bar is prominently displayed with the text 'Search for news, symbols or companies'. Below the search bar, there are links to Finance Home, Yahoo Originals, Personal Finance, Tech, Market Data, Industry News, and My Portfolio. A status bar at the top right indicates 'US Markets open in 3 hrs and 56 mins'.






Key elements on the page include:


- Advertisements:** A large ad for a class action settlement for users of Apple Safari or Internet Explorer browsers. Below it, there are smaller ads for E*TRADE, Scottrade, and Ameritrade.
- Market Data:** A section titled 'Trending Tickers' showing a table of stock prices and changes. The table includes columns for Symbol, Last Price, Market Time, Change, % Change, Volume, Avg Vol (3 month), Intraday High/Low, 52 Week Range, Day Chart, and Market Cap. The first ticker shown is ^BVSP (IBOVESPA) with a last price of 58,586.11 and a change of 586.39 (1.01%).
- News Article:** A headline titled 'EMERGING MARKETS-Latam stocks, currencies mostly slip on Fed rate hike worries'. The article text mentions that Latin American stock markets rose on Monday after comments by a Federal Reserve official allayed concerns over a possible U.S. interest rate increase. Fed Governor Lael Brainard said on Monday the U.S. ...
- Other Content:** A section for '2016 EXPLORER' cars, featuring a Ford Explorer and a 'BUILD & PRICE' button. There is also a small video player at the bottom right.


Yahoo Ad Network / A18+ / 300x250




 Search for people, places and things


 Christina Home    


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 Edit Profile


FAVORITES


 News Feed

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 Events


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GROUPS


 The Emerson Mafia 20+


 TechLions 20+

 Funk wit it Hudson ...


 Bestie Festie Peeps 1


 Jeff McClusky & As... 1


 Discover Groups


 Create Group


APPS


 Live Video


 Games


 On This Day


 Bandsintown


 Starscape 2012 Li...

 Games Feed 20+

 Photo/Video


 Photo/Video Album



 What's on your mind?


 Friends

Post

Augie Livres was tagged in this.

 **Megan Livres** with Augie Livres.



9 hrs ·  · 




Married Augie Livres


Yesterday


[See Relationship](#)




 Brianna Viglione and 5 others

TRENDING

 **Rob Kardashian**
22K people talking about this


 **Lower Manhattan**
23K people talking about this

 **Alexis Arquette**
34K people talking about this

[See More](#)

SPONSORED


Create Ad



Google Class Action
cases.gcgin.com/ggl
If you used Safari or IE web browsers, a class action settlement could affect you

English (US) · Español · Português (Brasil)

· Français (France) · Deutsch





AN ENTRAVISION COMPANY

PULPO MEDIA DISPLAY

Placement: Desktop

Banner Size: 728x90

ScreenShot URL: <https://www.terra.com/>

ScreenShot date: 9/12/2016

The screenshot shows the Terra website homepage. At the top is an orange navigation bar with a menu icon, a search bar labeled 'buscar', the 'terra' logo, and social media icons. Below the navigation bar is a grey banner with a blue background and white text. The banner contains a small icon of a computer screen with a red 'X' and the text: 'Si usted utilizó los navegadores de Internet Apple Safari o Internet Explorer, usted podría verse afectado por una acción judicial colectiva'. Below this text is a small link 'prepared by GCG'. Below the banner is a row of sports scores: SUN 0 x 0 EVT (Premier League - 15h00), EMP 1 x 1 CRO (Calcio Serie A - Liga Italiana - 14h45), FEI 1 x 0 TON (Liga Portuguesa - 15h00). Below the scores is a row of category links: AUTOS, DEPORTES, ENTRETENIMIENTO, FUTBOL, HORÓSCOPO, NOTICIAS, TERRA TV, VIDA Y ESTILO. Below the links are three main content blocks. The first block is a movie poster for 'Fifty Shades Darker' featuring Anastasia Steele, with the text 'Anastasia Steele protagoniza primer póster' and '10 min'. The second block is a news article titled 'Diagnóstico de pulmonía siembra dudas de la salud de Clinton' with a photo of Hillary Clinton and the text '6h'. The third block is a news article titled 'El último adiós de las estrellas a Alexis Arquette' with a photo of Alexis Arquette and the text '31 min'. To the right of the news articles is a large advertisement for a Honda pickup truck with the text 'ES MUY CERQUITA. DIJERON.' and the Honda logo.



AN ENTRAVISION COMPANY

PULPO MEDIA DISPLAY

Placement: Desktop**Banner Size:** 300x250**ScreenShot URL:** <http://www.publimetro.co/entretenimiento/>**ScreenShot date:** 09/12/2016

The screenshot displays the Publimetro website interface. At the top, there is a green header with the 'publimetro' logo and a date 'Lunes 12 de Septiembre de 2016'. A prominent blue banner advertisement is positioned above the main content, featuring a pill bottle and text about a settlement for antibiotics in California. Below the header, a navigation bar includes links for Home, Noticias, Economía, Deportes, Entretenimiento, Estilo de Vida, Nueva Mujer, Publimetro TV, Opinión, and Virales. The main content area is titled 'ENTRETENIMIENTO' and features a large video player showing a woman, Edna Márquez. Below the video, the headline reads '¿Qué ha pasado con Edna Márquez, exprotagonista de Novela?'. To the right of the main content, there is a 'BUSCADOR' (Search) section with a search bar and a warning message about browser security. Below the search bar, there is an advertisement for Adidas Men's Superstar Circular Knit shoes, priced at \$79.99. The bottom of the page features a 'publimetro TV' logo and social media icons for Facebook, Twitter, and Google+.

publimetro

Lunes 12 de Septiembre de 2016

Si Usted Pago Por El Antibiotico
Cipro En El Estado De California
Puede Recebir \$25 O Mas De Un Acuerdo
Complete El Formulario
www.CiproSettlement.com

Síguenos f t g+

Home > Entretenimiento

Home Noticias Economía Deportes Entretenimiento Estilo de Vida Nueva Mujer Publimetro TV Opinión Virales

ENTRETENIMIENTO

¿Qué ha pasado con Edna Márquez, exprotagonista de Novela?

Aunque no ganó el reality, Edna Márquez se hizo popular entre los televidentes colombianos luego de su participación en el Protagonistas de Novela 2002, ahora conocido como Protagonistas de Nuestra Tele. Luego de eso, la cucuteña decidió radicarse en Bogotá en busca de...

BUSCADOR





Buscador


Si usted utilizó los navegadores de internet Apple Safari o Internet Explorer, usted podría verse afectado por una acción judicial colectiva




Adidas Men's Superstar Circular Knit...
\$79.99
Free Shipping on Thousands of Styles
Finish Line


publimetro TV


DESKTOP 728X90



TV GUIDE Search TV Guide here!  SIGN IN / UP  WHAT'S ON WATCHLIST NEWS & FEATURES  

 If You Used Apple Safari Or Internet Explorer Browsers,
You Could Be Affected By A Class Action Settlement
prepared by GCG

TV GUIDE Today's News

6 Things We Learned from the Creative Arts Emmy Awards
Game of Thrones is about to make history
 

TV GUIDE Photo Gallery


 Introducing the
Flex Pack™
Don't Watch? **Don't Pay.**
\$39⁹⁹ /mo
Guaranteed for 2 years **Create Now**

TV GUIDE Watchlist **Sign In** 
Editors' Picks On TV **See all »**
 Dancing With the St...

DESKTOP 300X250

The screenshot displays the AccuWeather website interface for Westlake Village, CA. The top navigation bar includes location links (World > North America > United States > California > Westlake Village), language settings (ENGLISH (US), °F), and social media links. The main header features the AccuWeather logo and a search bar containing 'Westlake Village, CA'. Below the header, a dark navigation bar shows 'United States Weather' and 'Westlake Village, CA Local Weather' with a sun icon and '75°F'. A secondary bar indicates 'Now 3:57 pm PDT' and offers tabs for 'Weekend', 'Extended', 'Month', and 'Radar', along with 'MinuteCast®' and a 'Watch Videos' button.

The main content area is divided into several sections:

- CURRENT WEATHER:** Shows a sun icon, a temperature of 75°F, a RealFeel of 78°, and the condition 'Sunny'. A 'See Hourly' link is at the bottom.
- TODAY SEP 12:** Shows a sun and cloud icon, a high of 72°F, a RealFeel of 75°, and the forecast 'Low clouds followed by sun'.
- TONIGHT SEP 12:** Shows a moon and cloud icon, a low of 59°F, a RealFeel of 59°, and the forecast 'Becoming cloudy, late mist'.
- TOMORROW SEP 13:** Shows a sun and cloud icon, a high of 70°F, a RealFeel of 76°, and the forecast 'Morning mist; clouds breaking'.

Each forecast section includes a 'More' link. To the right of these forecasts is a 'Trending Now' section with two items:

- WATCH:** Tornado rips through Illinois
- VIRAL:** Koala interrupts soccer game as crowd cheers it on

Below the forecasts are two video thumbnails:

- Video Weather Forecast:** Labeled 'Wednesday's Forecast', it shows a map of California and a female meteorologist.
- Westlake Village Radar:** Shows a radar map of the Westlake Village area with various locations labeled (e.g., Bakersfield, Lancaster, Palmdale).

On the far right, there is a large advertisement for a class action settlement, featuring a computer monitor icon with 'http://', the text 'If You Used Apple Safari Or Internet Explorer Browsers.', and 'You Could Be Affected By A Class Action Settlement'.

EXHIBIT D

The Garden City Group Legal Notice – PEOPLE's 10/17 Issue



United States Postal Service
2016 Statement of Ownership, Management and Circulation

1. Publication Title: PEOPLE
2. Publication Number: 0006-1150
3. Filing date: October 1, 2016
4. Issue Frequency: Weekly
5. Number of Issues Published Annually: 52
6. Annual Subscription Price: \$116.07
7. Complete Mailing Address of Known Office of Publication: 225 Liberty St., New York, NY 10281-1008
8. Complete Mailing Address of Headquarters or General Business Office of Publisher: 225 Liberty St., New York, NY 10281-1008
9. Full Name and Complete Mailing Address of the Publisher, Editorial Director, Chief Content Officer, Publisher, President & CEO, Editorial Director, Vice President, and Circulation Director: JANA KRAMER, 225 Liberty St., New York, NY 10281-1008
10. Owner: Time Inc., 225 Liberty St., New York, NY 10281-1008
11. Known Bondholders, Mortgagees, and Other Security Holders Owning or Holding 1 percent or more of Total amount of Bonds, Mortgages, or Securities:
To the best knowledge of Time Inc., the names and addresses of stockholders beneficially owning 1 percent or more of the common stock of Time Inc. as of June 30, 2016 (according to 13F filings with the U.S. Securities and Exchange Commission), are as follows:
Frontpoint Capital, LLC, One H. Franklin, #1500, Chicago, Illinois 60606; BlackRock Fund Advisors, 400 Howard St., San Francisco, California 94105-2228; The Vanguard Group, Inc., 100 Vanguard Blvd., Malvern, Pennsylvania 19355; JANA Partners, LLC, 707 Park Avenue, Suite 800, New York, New York 10022; Westwood Management Corporation, 2000 Crescent Ct., #200, Dallas Texas 75201; LP Morgan Investment Management, Inc., 270 Park Ave., 8th Fl., New York, New York 10022; State Street Global Advisors (SSGA), One Lincoln St., 27th Fl., Boston, Massachusetts 02111-2900; Dimensional Fund Advisors, L.P. (DFA), 100 State St., Suite 1000, New York, New York 10038; Northern Trust Investments, Inc., 50 S. LaSalle St., 4th Fl., Chicago, Illinois 60605; Quantitative Management Associates, LLC, 751 Broad Street, Newark, New Jersey 07102; Redfin Asset Management Corporation, 171 W. Jackson Blvd., #600, Chicago, Illinois 60604; Robby Management & Research Company, 245 Summer Street, Boston, Massachusetts 02210; The Boston Company Asset Management, LLC, 1 Boston Place, Suite 2600, Boston, Massachusetts 02108; Renaissance Technologies, LLC, 800 Third Avenue, New York, New York 10022; TCM Investment Management Company, 865 South Figueroa Street, Suite 1800, Los Angeles, California 90017; Invesco Asset Management, LTD (LLC), Woodlake Exchange, 4th Fl., 25 Broad St., London, UK EC2V 7JH.
12. Not Applicable
13. Publication Title: PEOPLE
14. Issue Date for Circulation Data Below: September 12, 2016
15. Extent and Nature of Circulation:
Average No. Copies Each Issue During Preceding 12 Months:
a. Total number of copies: 4,704,895
b. Paid circulation
1. Mailed Outside-County Paid Subscriptions Stated on PS Form 3541: 2,742,128
2. Mailed In-County Paid Subscriptions Stated on PS Form 3541: 1,962,767
3. Paid Distribution Outside the Mails including Sales Through Dealers and Carriers, Street Vendors, Counter Sales, and Other Paid Distribution Outside USPS: 0
4. Paid Distribution by Other Classes of Mail Through the USPS: 0
c. Total Paid Distribution: 4,704,895
d. Free or Nominal Rate Distribution Outside the Mails including Sales Through Dealers and Carriers, Street Vendors, Counter Sales, and Other Paid Distribution Outside USPS Form 3541: 2,222,754
e. Free or Nominal Rate Distribution Outside the Mails including Sales Through Dealers and Carriers, Street Vendors, Counter Sales, and Other Paid Distribution Outside USPS Form 3541: 0
f. Free or Nominal Rate Copies Mailed at Other Classes Through the USPS: 0
g. Free or Nominal Rate Distribution Outside the Mail: 9,471
h. Total Free or Nominal Rate Distribution: 2,232,225
i. Total Distribution: 6,937,120
j. Copies not Distributed: 1,033,371
k. Total: 4,704,895
l. Percent Paid: 95.6%
Number of Copies of Single Issue Published Nearest to Filing Date: September 12, 2016
1. Total number of copies: 4,829,685
2. Paid circulation
a. Mailed Outside-County Paid Subscriptions Stated on PS Form 3541: 2,658,595
b. Mailed In-County Paid Subscriptions Stated on PS Form 3541: 1,970,090
c. Paid Distribution Outside the Mails including Sales Through Dealers and Carriers, Street Vendors, Counter Sales, and Other Paid Distribution Outside USPS: 0
d. Paid Distribution by Other Classes of Mail Through the USPS: 0
e. Total Paid Distribution: 4,628,685
f. Free or Nominal Rate Distribution Outside the Mails including Sales Through Dealers and Carriers, Street Vendors, Counter Sales, and Other Paid Distribution Outside USPS Form 3541: 2,060,024
g. Free or Nominal Rate Distribution Outside the Mails including Sales Through Dealers and Carriers, Street Vendors, Counter Sales, and Other Paid Distribution Outside USPS Form 3541: 0
h. Free or Nominal Rate Copies Mailed at Other Classes Through the USPS: 0
i. Free or Nominal Rate Distribution Outside the Mail: 8,471
j. Total Free or Nominal Rate Distribution: 2,068,495
k. Total Distribution: 6,697,180
l. Copies not Distributed: 1,132,505
m. Total: 4,829,685
n. Percent Paid: 95.9%
16. Publication of Statement of Ownership required by the October 17, 2016 issue of this publication.
17. Signature and date:
I certify that all information furnished on this form is true and complete. I understand that anyone who furnishes false or misleading information on this form or who omits material or information requested on the form may be subject to criminal sanctions (including fines and imprisonment) and/or civil sanctions (including civil penalties).
NOTICE TO SUBSCRIBERS
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If You Used Apple Safari Or Internet Explorer Browsers, You Could Be Affected By A Class Action Settlement.

What Is This Lawsuit About?

A class action settlement has been reached in *Re: Google Inc. Cookie Placement Consumer Privacy Litigation, Case No. 12-MD-2158 (SLR)*. Plaintiffs allege that, in violation of federal and state laws, Google placed third-party tracking cookies on browsers that visited websites containing Google ads by circumventing browser settings that were set to block such cookies. Google denies all allegations of wrongdoing.

The Settlement Agreement provides for substantial injunctive relief for Settlement Class Members, including assurances from Google regarding its remediation efforts. Google has also agreed to pay \$5.5 million to be distributed to various non-profit or educational institutions that agree to devote the funds to promote public awareness, research, and initiatives related to the security or privacy of Internet browsers.

Are You Affected?

If you used a Safari or Internet Explorer browser in 2011-2012 with the browser cookie settings set, by default or by choice, either to accept only cookies from "visited" sites or to block cookies from "third parties and advertisers," and you visited a non-Google website that displayed ads from doubleclick.net (Google's advertising serving service), and a cookie from doubleclick.net was placed on your browser as a result of that visit, you may be a Class Member.

What Are Your Rights And Options

A Class Member may request exclusion by sending a completed "Request for Exclusion" form to the Administrator postmarked by November 27, 2016. If you submit a timely Request for Exclusion you shall not be affected by the Settlement. Class Members that do not exclude themselves from the Settlement will be bound by its terms and will release any and all claims.

If you wish to comment or object in writing to any aspect of the proposed Settlement or to Class Counsel's request for attorneys' fees and expenses or incentive awards, you may do so by filing your comments or objections with the Court and sending them by U.S. Mail or email to the Parties no later than December 21, 2016.

When Is The Fairness Hearing?

The Court has scheduled a hearing at 1:00 pm on January 11, 2017, in the Courtroom of the Honorable Sue L. Robinson, Judge of the U.S.D.C., District of Delaware, at J. Caleb Boggs Federal Building, 844 N. King Street, Room 4124, Unit 31, Wilmington, DE 19801-3568. At this hearing, the Court will consider if the Settlement should be granted final approval and Class Counsel's application for attorneys' fees and expenses and incentive awards should be approved. Although you may attend the hearing or send your own attorney at your own expense, you are not required to do so.

Where Can I Get More Information?

This notice is a summary only. If you need further information, please view the Long Form Notice at <http://cases.gcgcinc.com/ggl> or please contact Class Counsel, Brian R. Strunge, Strunge & Butler, LLP, 1210 Wilshire Blvd., Ste. 1900, Los Angeles, CA 90025; Stephen G. Grygiel, Silverman Thompson Slutkin White, 201 N. Charles Street, 26th Floor, Baltimore, MD 21201; and/or James P. Pricklen, Bartimus, Frickleton, and Robertson, PC, 11150 Overbrook Road, Suite 200, Leeswood, KS 66211.

PLEASE DO NOT CONTACT THE COURT.

<http://cases.gcgcinc.com/ggl>

EXHIBIT E

NOTICE OF CLASS ACTION SETTLEMENT

In re Google Inc. Cookie Placement Consumer Privacy Litigation,
12-MD-2358 (SLR)
United States District Court, District of Delaware

IMPORTANT: THIS NOTICE IS BEING PROVIDED BY COURT ORDER. PLEASE READ THIS ENTIRE NOTICE CAREFULLY. A SETTLEMENT REACHED WITH DEFENDANT GOOGLE INC. (“GOOGLE”) IN A PENDING CLASS ACTION LITIGATION MAY AFFECT YOUR RIGHTS.

This Notice answers the following questions:

1. Why should I read this Notice?
2. What is a class action and who is involved?
3. What is the lawsuit about?
4. Who are the members of the Settlement Class?
5. What are the terms of the proposed settlement?
6. What are the important dates?
7. Who represents the Settlement Class and what are the associated attorneys’ fees and expenses?
8. What are the reasons for the settlement?
9. What claims are being released?
10. Can I exclude myself from the settlement and release?
11. What is the settlement approval procedure and how can I make my views known?
12. Where can I get additional information?

1. WHY SHOULD I READ THIS NOTICE?

Your rights may be affected by a class action lawsuit, *In re Google Inc. Cookie Placement Consumer Privacy Litigation*. It was filed by the plaintiffs in United States District Court for the District of Delaware under Case No. 12-MD-2358 (SLR).

The purpose of this Notice is to provide important information to people in the United States who may be Class Members. You may be a Class Member if in 2011-2012 you used a Safari or Internet Explorer web browser with the browser cookie settings set, by default or by choice, either to accept cookies only from “visited” sites or to block cookies from “third parties and advertisers,” and you visited a non-Google website that displayed ads from doubleclick.net (Google’s advertising serving service), and a cookie from doubleclick.net was placed on your browser as a result of that visit.

This notice is also to inform you that: (1) a settlement of the Class Action (the “Settlement”) with Google has been preliminarily approved by the court in Delaware; and (2) a hearing has been scheduled at 1:00 pm on January 11, 2017, in the Courtroom of the Honorable Sue L. Robinson, Judge of the United States District Court, District of Delaware. The Court is located at the J. Caleb Boggs Federal Building, 844 N. King Street, Room 4124, Unit 31, Wilmington, DE 19801-3568. The hearing is to consider the fairness and adequacy of the Settlement. The judge will also consider Class Counsel’s request for attorneys’ fees and expenses, and the incentive awards for the Representative Plaintiffs.

This settlement, if finally approved, will decide the litigation with respect to the Defendant (“Google”) only and will be subject to any appeals. The litigation will continue with respect to the Non-Settling Defendants.

2. WHAT IS A CLASS ACTION AND WHO IS INVOLVED?

In a class action lawsuit, one or more people, called “Representative Plaintiffs” or “Named Plaintiffs” sue on behalf of people who have similar claims. The people together are called the “Class” or “Class Members.” The Representative Plaintiffs, through Class Counsel, have reached the proposed Settlement with Google. The Court has allowed, or “certified,” this to proceed as a class action solely for purposes of the Settlement, and all decisions that the Court makes concerning the Settlement will affect all of the Class Members.

3. WHAT IS THE LAWSUIT ABOUT?

Named Plaintiffs (“Plaintiffs”) and other individuals filed complaints claiming that Google set cookies on Plaintiffs’ Apple Safari or Microsoft Internet Explorer web browsers. They claim this is in conflict with the default cookie settings of such browsers and in violation of federal and state laws. These complaints were consolidated and transferred to the United States District Court for the District of Delaware. On June 21, 2016, Plaintiffs filed their Amended Class Action Complaint (the “Complaint”) against Google and other parties (“Non-Settling Defendants”).

Plaintiffs allege that Google installed third-party tracking cookies when Plaintiffs and Class Members visited a website containing an advertisement placed by Google. They allege that Google circumvented Apple Safari or Microsoft Internet Explorer web browser settings that blocked such cookies. Plaintiffs allege Google used those cookies to knowingly intercept and gain access to Plaintiffs’ and Class Members’ Internet communications and activity.

Google denies all allegations of wrongdoing, but has agreed to settle the case to avoid the uncertainties, expenses, and time of further litigation. Google believes that the placement of cookies was a legitimate, lawful, and permissible activity that fostered advertising effectiveness.

Counsel for the Plaintiffs believe they have a strong case on the merits and that a class would be certified for litigation purposes. Plaintiffs are prepared to seek class certification and present evidence that Google engaged in improper conduct, and that the Settlement Class was harmed as a result. Google is likewise prepared to mount a vigorous defense on numerous important questions, including whether the claims are legally viable; whether the case is properly subject to class certification for litigation purposes; and whether the Plaintiffs or members of the Settlement Class suffered any harm even assuming the truth of the allegations as pled.

The Settlement was reached only after many detailed arms-length negotiations conducted in good faith. On August 31, 2016, the Court granted preliminary approval of the settlement and certified the Settlement Class for the purposes of settlement only. It also appointed Plaintiffs Jose M. (“Josh”) Bermudez, Nicholas Todd Heinrich, and Lynne Krause (“Plaintiffs”), as representatives of the Settlement Class, and Strange & Butler, LLP, Silverman Thompson Slutkin White, and Bartimus, Frickleton and Robertson, P.C., as Settlement Class Counsel. The Court ordered that this Notice be disseminated.

THIS NOTICE IS NOT AN EXPRESSION OF ANY OPINION BY THE COURT REGARDING THE MERITS OR LACK THEREOF OF ANY OF THE CLAIMS OR DEFENSES ASSERTED BY PLAINTIFFS OR DEFENDANT.

4. WHO ARE THE MEMBERS OF THE SETTLEMENT CLASS?

The Settlement Class consists of all persons in the United States of America who used the Apple Safari or Microsoft Internet Explorer web browsers and who visited a website from which Doubleclick.net (Google’s advertising serving service) cookies were placed by the means alleged in the Complaint. The Complaint alleges that in 2011-2012, users of Apple Safari or Microsoft Internet Explorer web browsers that were set to accept cookies only from “visited” sites or to block all cookies from “third parties and advertisers” who visited a non-Google website containing an advertisement served by Doubleclick.net (Google’s advertising serving service) and who did not already have a cookie from the Doubleclick.net domain would have received one as a result of this visit because of means employed by Google to set cookies under these circumstances.

IF YOU ARE A MEMBER OF THE SETTLEMENT CLASS, YOU WILL BE BOUND BY THIS SETTLEMENT. YOU MAY, BUT ARE NOT REQUIRED TO, APPEAR IN PERSON AT THE SETTLEMENT FAIRNESS HEARING, OR HAVE AN ATTORNEY APPEAR ON YOUR BEHALF, AND/OR SUBMIT COMMENTS REGARDING THE FAIRNESS, ADEQUACY, AND REASONABLENESS OF THE SETTLEMENT.

IF THE SETTLEMENT IS FINALLY APPROVED BY THE COURT, THE JUDGMENT WILL BIND ALL PERSONS IN THE SETTLEMENT CLASS. THEIR CLAIMS AGAINST GOOGLE AND GOOGLE RELATED PARTIES SHALL FOREVER BE RELEASED AND DISMISSED.

5. WHAT ARE THE TERMS OF THE PROPOSED SETTLEMENT?

In exchange for the release of claims of the Settlement Class Members, the Settlement Agreement provides for substantial injunctive and prospective relief for Settlement Class Members. Among these is Google taking steps designed to expire or delete, by modifying the cookie deletion date contained in each cookie, all third-party Google cookies that exist in the Safari Browser files for Safari Browsers.¹ The parties agree that this action by Google is a practical, reasonable, and effective means of removing the cookies at issue. Google has also agreed to pay \$5.5 million into a settlement fund to be distributed to various non-profit and/or educational institutions. These institutions must agree to devote the funds to promote public

¹ This will not apply to Google “opt-out” cookies, which are cookies users can choose to accept that allow them to “opt-out” of Google’s third-party cookies themselves. Therefore, those users would not want the “opt-out” cookies to be expired or deleted.

awareness and education, and/or to support research, development, and initiatives, related to the security and/or privacy of Internet browsers.

6. WHAT ARE THE IMPORTANT DATES AND DEADLINES TO ACT?

Opt-Out Deadline: November 27, 2016
Objection Deadline: December 21, 2016
Fairness Hearing: January 11, 2017 at 1:00 pm

7. WHO REPRESENTS THE SETTLEMENT CLASS AND WHAT ARE THE ASSOCIATED ATTORNEYS' FEES AND EXPENSES?

The Court has appointed, Jose M. ("Josh") Bermudez, Nicholas Todd Heinrich, and Lynne Krause as the Settlement Class Representatives. It has appointed Strange & Butler, LLP, Silverman Thompson Slutkin White, and Bartimus, Frickeleton, and Robertson, P.C. as Class Counsel for the Settlement Class.

Class Counsel have been prosecuting this litigation on a contingency fee basis (that is, without compensation) while advancing litigation expenses. In advance of the Fairness Hearing, Class Counsel will ask the Court for attorneys' fees and litigation costs/expenses in the amount of up to \$2,500,000 to be paid from the Settlement Fund. Google has agreed not to oppose this request. Class Counsel will also apply to the Court for incentive awards for the Settlement Class Representatives in the amount of up to \$1000 each, to be paid from the Settlement Fund. Google has also agreed not to oppose this motion. All such reimbursements will be subject to approval by the Court. Settlement Class Members are not personally responsible for any attorneys' fees, expenses, or incentive awards. Class counsel's attorneys' fees and expenses and Settlement Class Representatives' incentive awards are to be paid from the Settlement Fund in an amount authorized by the Court. Settlement Class Members are not personally responsible for payment of any attorney's fees, unless they hire their own attorney to represent them in this case.

8. WHAT ARE THE REASONS FOR THE SETTLEMENT?

Class Counsel have thoroughly investigated the facts and circumstances relevant to the claims at issue in the litigation. Class Counsel have also considered the expense and length of time necessary to prosecute the litigation through trial and any appeals, the uncertainties associated with the outcome of any litigation including this one, and the benefits provided by the proposed Settlement. Based upon their investigation and evaluation of the claims and defenses, Class Counsel have concluded that it is in the best interests of the Settlement Class to resolve the claims against Google on the terms outlined in this document.

9. WHAT CLAIMS ARE BEING RELEASED?

If the Settlement Agreement is approved by the Court, each Settlement Class Member will release and dismiss Google, and its past, present, and future parents, divisions, subsidiaries, partnerships, affiliates, and other related entities (whether or not they are wholly owned), together with the directors, officers, employees, agents, insurers, reinsurers and attorneys of any of them (but not including any of the other Defendants named in the Consolidated Amended Complaint, or any of their past, present and future parents, divisions, subsidiaries, partnerships, affiliates and other related entities (whether or not wholly owned), together with their directors, officers, employees, agents, insurers, reinsurers and attorneys), from any and all potential or actual matters, claims, demands, rights, liabilities, losses, obligations, duties, actions,

potential actions, and causes of action of any kind whatsoever, whether at common law, pursuant to statute, ordinance, or regulation, in equity or otherwise, which any Class Member has or might have, known or unknown, including Unknown Claims, defined below, of any kind whatsoever prior to the Effective Date and that Plaintiffs alleged or could have alleged in the Complaint against Google or that otherwise are based on or relate to, wholly or partially, the facts and circumstances Plaintiffs alleged in the Complaint's claims against Google.

Without limiting the generality of the foregoing description of Released Claims, the Class Members may hereafter discover facts in addition to or different from those that any of them now knows or believes to be true with respect to the facts, circumstances and import of Plaintiffs' Complaint's claims against Google. However, the Class Members fully, finally, and forever settle and release any and all claims set forth in this Paragraph, known or unknown, suspected or unsuspected, contingent or non-contingent, whether or not concealed or hidden, that now exist, or heretofore have existed upon any theory of law or equity now existing or coming into existence in the future, including, but not limited to, conduct that is negligent, reckless, intentional, with or without malice, or a breach of any duty, law, or rule, without regard to the subsequent discovery or existence of such different or additional facts. The Class Members acknowledge that the inclusion of such "Unknown Claims" in the Agreement was separately bargained for and was a key element of the Agreement.

By the definition of Released Claims set forth above, the Class Members hereby intend expressly to waive the provisions, rights, and benefits of any state law or rule that seeks to or does preserve known or unknown claims that would otherwise be released by this Settlement Agreement, including California Civil Code § 1542, which provides:

A GENERAL RELEASE DOES NOT EXTEND TO CLAIMS WHICH THE CREDITOR DOES NOT KNOW OR SUSPECT TO EXIST IN HIS FAVOR AT THE TIME OF EXECUTING THE RELEASE, WHICH IF KNOWN BY HIM MUST HAVE MATERIALLY AFFECTED HIS SETTLEMENT WITH THE DEBTOR.

The Named Plaintiffs and Class Members expressly waive any and all provisions, rights, and benefits conferred by any law of any state or territory of the United States, or of any other nation that is similar, comparable, or equivalent to California Civil Code § 1542.

10. CAN I EXCLUDE MYSELF FROM THE SETTLEMENT AND RELEASE?

A Class Member may request exclusion from the Class up until the Opt-Out Deadline (see Paragraph 6 above). To request exclusion, the Class Member must complete, sign, and mail the "Request for Exclusion" form attached to this notice to the Settlement Administrator. The Request for Exclusion must be signed by the Class Member seeking exclusion under penalty of perjury. The Request for Exclusion must be postmarked on or before the Opt-Out Deadline. Any Person who submits a valid and timely Request for Exclusion shall not be entitled to relief under, and shall not be affected by, the settlement or any relief provided by the settlement. The parties to the settlement will have the right to challenge the timeliness and validity of any Request for Exclusion, in which case the Court will determine whether any contested exclusion request is valid. Class Members that do not follow the steps to be excluded from the settlement will be bound by the settlement and will release any and all claims as set forth in Paragraph 9, above.

11. WHAT IS THE SETTLEMENT APPROVAL PROCEDURE AND HOW CAN I MAKE MY VIEWS KNOWN?

The Court has scheduled a hearing at 1:00 pm on January 11, 2017, in the Courtroom of the Honorable Sue L. Robinson, Judge of the United States District Court, District of Delaware. The Court is located at J. Caleb Boggs Federal Building, 844 N. King Street, Room 4124, Unit 31, Wilmington, DE 19801-3568.

At this hearing, the Court will consider, among other matters, whether the Settlement should be granted final approval as fair, adequate and reasonable, and in the best interests of Settlement Class Members. It will also consider Class Counsel's application for attorneys' fees and expenses and incentive awards for the Representative Plaintiffs. Although you may attend the hearing in person or through your own attorney at your own expense, you are not required to do so. If you wish to comment in writing in support or in opposition to any aspect of the proposed Settlement or to Class Counsel's request for attorneys' fees and expenses or incentive awards for the Representative Plaintiffs, you may do so by filing your written comments or objections with the Court. Send them by U.S. Mail or email (including ECF service) to (1) Brian R. Strange, Strange & Butler, LLP, 12100 Wilshire Blvd., Ste. 1900, Los Angeles, CA 90025; Stephen G. Grygiel, Silverman Thompson Slutkin White, 201 N. Charles Street, 26th Floor, Baltimore, MD 21201; and/or James P. Frickleton, Bartimus, Frickleton, and Robertson, P.C., 11150 Overbrook Road, Suite 200, Leawood, KS 66211, and (2) Michael Rubin, Wilson Sonsini Goodrich & Rosati, One Market Plaza, Spear Tower, Suite 3300, San Francisco, CA 94105. They must be postmarked, faxed, or delivered (or served by ECF) on or before December 21, 2016. The Court will not be able to give much consideration to general comments lacking detail, for example, a submission simply stating, "I object" or "I support the Settlement" will not provide enough information to the Court or Parties. Your submission must also include your name and current address, a statement that you are a Settlement Class Member, and the case caption.

12. WHERE CAN I GET ADDITIONAL INFORMATION?

This notice only contains a summary of the proposed Settlement. You may appear in person during regular business hours at the Clerk's office of the United States District Court, District of Delaware. The office is located at 844 North King St Unit 18, Wilmington, DE 19801-3570. You can also review online the entire Settlement Agreement, as well as the pleadings, records and other papers on file with the Court.

If you need further information, please contact Class Counsel, Brian R. Strange, Strange & Butler, LLP, 12100 Wilshire Blvd., Ste. 1900, Los Angeles, CA 90025; Stephen G. Grygiel, Silverman Thompson Slutkin White, 201 N. Charles Street, 26th Floor, Baltimore, MD 21201; and/or James P. Frickleton, Bartimus, Frickleton, and Robertson, P.C., 11150 Overbrook Road, Suite 200, Leawood, KS 66211.

PLEASE DO NOT CONTACT THE COURT WITH QUESTIONS.

REQUEST FOR EXCLUSION FORM

THIS REQUEST MAY AFFECT YOUR LEGAL RIGHTS.

In re Google Inc. Cookie Placement Consumer Privacy Litigation, United States District Court,
District of Delaware, Case No. 12-MD-2358 (SLR)

If you do not want to participate in the settlement and wish to exclude yourself from the Class, that is, to “OPT-OUT” of this settlement, then you must complete this Request for Exclusion, sign under penalty of perjury, date and mail the Form to the address below. You must submit this Form, postmarked no later than November 27, 2016.

By electing to “OPT-OUT” of the settlement (i) you will not share in any benefits from the settlement, (ii) you will not be bound by any further orders or judgment entered for or against the Class, and (iii) you will remain able to independently pursue any claims alleged in this action, against Google Inc., by filing your own lawsuit at your own expense.

“I hereby opt-out of the Class and request to be excluded from the settlement in *In re Google Inc. Cookie Placement Consumer Privacy Litigation*, United States District Court, District of Delaware, Case No. 12-MD-2358 (SLR).”

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Address:																													
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City:																				State:					ZIP:				
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I declare under penalty of perjury under the laws of the State of _____ that the foregoing is true and correct.																													
Signature of the Claimant:																				Date:									
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Mail completed and signed Request for Exclusion to:
In re Google Inc. Cookie Placement Settlement Administrator
c/o GCG
PO Box 10320
Dublin, OH 43017-5920

EXHIBIT F

REQUEST FOR EXCLUSION FORM

THIS REQUEST MAY AFFECT YOUR LEGAL RIGHTS.

In re Google Inc. Cookie Placement Consumer Privacy Litigation, United States District Court,
District of Delaware, Case No. 12-MD-2358 (SLR)

If you do not want to participate in the settlement and wish to exclude yourself from the Class, that is, to “OPT-OUT” of this settlement, then you must complete this Request for Exclusion, sign under penalty of perjury, date and mail the Form to the address below. You must submit this Form, postmarked no later than November 27, 2016.

By electing to “OPT-OUT” of the settlement (i) you will not share in any benefits from the settlement, (ii) you will not be bound by any further orders or judgment entered for or against the Class, and (iii) you will remain able to independently pursue any claims alleged in this action, against Google Inc., by filing your own lawsuit at your own expense.

“I hereby opt-out of the Class and request to be excluded from the settlement in *In re Google Inc. Cookie Placement Consumer Privacy Litigation*, United States District Court, District of Delaware, Case No. 12-MD-2358 (SLR).”

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City:																				State:					ZIP:				
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I declare under penalty of perjury under the laws of the State of _____ that the foregoing is true and correct.																													
Signature of the Claimant:																				Date:									
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Mail completed and signed Request for Exclusion to:
In re Google Inc. Cookie Placement Settlement Administrator
c/o GCG
PO Box 10320
Dublin, OH 43017-5920

EXHIBIT G

IN RE GOOGLE INC COOKIE PLACEMENT CONSUMER PRIVACY
LITIGATION
EXCLUSION REQUESTS

GCG ID NO.	CLASS MEMBER NAME	UNTIMELY	UNSIGNED
B4E535D02C	AKIKO DUNN		
C395C9BF85	ALAN LANSING		
609F01BCE3	ALEKSANDR Y SHINKAREV		
5004E9094B	ALESIA JACKSON		
D8576D76A5	ANDREY SHLOMOVICH		
A918648630	ANITRA MURPHY		
1113BDD2E6	BRADDOCK BUCK DEANGELO		
0A5BDF6236	BRYAN MURPHY		
F6CEEFE734	CAMERON CORNELISON		
59E7A68549	CHARLES E RICHARDSON		X
2C3D6535C6	CHARLES JACKLIN		
7457060D41	CHARLES RICHARDSON		
2D675464D7	CHRISTOPHER GALBRAITH		
34904D73FB	CODY THOMSON-ESQUER	X	
7D1F2D7B47	DEANGELO BRADDOCK		
F16BF035C1	DOREEN M CAOUETTE		
04AED75C43	DWAYNE HAWKINS-LODGE		
CAD886200A	EMANUEL HAJEK		
EBCCE4518F	GARY RICHARDSON		
C111B7C04C	GEROD GREEN		
DC5A7CED01	GLENDA JOHNSON		
485D8F69EA	GLENNA O'DELL		
97A52D8C4A	JAMES COBB		
37D5FC861D	JAMES L NELSON JR		
9E12FA2824	JAMES WALTON		
1B3A58CE36	JENNIFER SIMONIAN		
18C456CD80	JESSICA BROWN		
8A3F6127C0	JESSICA BROWN		
C5179FA632	JESSICA BROWN		
E623AA70EB	KAREN FENNESSEY		
264767730C	KIN WAH KUNG		
344DC93545	MARIA ZAPOLSKI		
4E38C388EC	MARINA SHLOMOVICH		
AD69E16E0C	MARY REPINE		
4E248D3080	MICHAEL BROWN		
D5F1F7F5C4	MICHAEL BROWN		

IN RE GOOGLE INC COOKIE PLACEMENT CONSUMER PRIVACY
LITIGATION
EXCLUSION REQUESTS

GCG ID NO.	CLASS MEMBER NAME	UNTIMELY	UNSIGNED
A89FE75E77	MICHELLE SHLOMOVICH		
E86A9EB8A0	MOHAMAD HAKKANI		
22A8716654	PETRA HAYEK		
6F6B6BCB5A	PHYLLIS BYRD		
603EFF417A	RACHELLE REESE		
E52A4866E2	RICHARD HAYEK		
CF4B00E930	RONY YARDEN		
91F80D4144	SHARD MASON		
2F35BB7580	SHERONDA WILLIAMS		
2C50A485E7	SMITH TRATICA		
BC9C044FF3	SONJI LANGFORD		
6BE7BD15DD	STEPHANIE WARD		
D2791B6886	TODD DORDAN		
8E8E55C18E	TRATICA SMITH		
E2D29C8163	UNITA FAY MITCHELL		X

EXHIBIT 2

IN RE GOOGLE INC COOKIE PLACEMENT CONSUMER PRIVACY
LITIGATION
EXCLUSION REQUESTS

UNIQUE ID NO	CLASS MEMBER NAME	UNTIMELY	UNSIGNED
91F80D4144	SHARD MASON		
97A52D8C4A	JAMES COBB		
7457060D41	CHARLES RICHARDSON		
344DC93545	MARIA ZAPOLSKI		
9E12FA2824	JAMES WALTON		
E623AA70EB	KAREN FENNESSEY		
4E38C388EC	MARINA SHLOMOVICH		
A89FE75E77	MICHELLE SHLOMOVICH		
F16BF035C1	DOREEN M CAOUETTE		
264767730C	KIN WAH KUNG		
A918648630	ANITRA MURPHY		
603EFF417A	RACHELLE REESE		
F6CEEFE734	CAMERON CORNELISON		
6BE7BD15DD	STEPHANIE WARD		
5004E9094B	ALESIA JACKSON		
0A5BDF6236	BRYAN MURPHY		
59E7A68549	CHARLES E RICHARDSON		X
1B3A58CE36	JENNIFER SIMONIAN		
1113BDD2E6	BRADDOCK BUCK DEANGELO		
2C50A485E7	SMITH TRATICA		
8E8E55C18E	TRATICA SMITH		
7D1F2D7B47	DEANGELO BRADDOCK		
AD69E16E0C	MARY REPINE		
2F35BB7580	SHERONDA WILLIAMS		
B4E535D02C	AKIKO DUNN		
E2D29C8163	UNITA FAY MITCHELL		X
D8576D76A5	ANDREY SHLOMOVICH		
C395C9BF85	ALAN LANSING		
D2791B6886	TODD DORDAN		
37D5FC861D	JAMES L NELSON JR		
4E248D3080	MICHAEL BROWN		
BC9C044FF3	SONJI LANGFORD		

IN RE GOOGLE INC COOKIE PLACEMENT CONSUMER PRIVACY
LITIGATION
EXCLUSION REQUESTS

UNIQUE ID NO	CLASS MEMBER NAME	UNTIMELY	UNSIGNED
8A3F6127C0	JESSICA BROWN		
2C3D6535C6	CHARLES JACKLIN		
CAD886200A	EMANUEL HAJEK		
E52A4866E2	RICHARD HAYEK		
22A8716654	PETRA HAYEK		
609F01BCE3	ALEKSANDR Y SHINKAREV		
6F6B6BCB5A	PHYLLIS BYRD		
E86A9EB8A0	MOHAMAD HAKKANI		
2D675464D7	CHRISTOPHER GALBRAITH		
C111B7C04C	GEROD GREEN		
CF4B00E930	RONY YARDEN		
04AED75C43	DWAYNE HAWKINS-LODGE		
DC5A7CED01	GLENDA JOHNSON		
EBCCE4518F	GARY RICHARDSON		
C5179FA632	JESSICA BROWN		
18C456CD80	JESSICA BROWN		
D5F1F7F5C4	MICHAEL BROWN		
485D8F69EA	GLENNA O'DELL		
34904D73FB	CODY THOMSON-ESQUER	X	
7FC1C49FA3	SONIA MARTINEZ	X	
7CFF2C7A31	ROCCO A. CONFORTI JR	X	
40AE9DB0CC	ROCCO A. CONFORTI JR	X	
7CFF2C7A31	ROCCO A. CONFORTI JR	X	
40AE9DB0CC	ROCCO A. CONFORTI JR	X	
344F34B05A	SONIA MARTINEZ	X	
342451F4E6	DANIEL FRANCO	X	
7FC1C49FA3	SONIA MARTINEZ	X	
342451F4E6	DANIEL FRANCO	X	
2793CE6AFD	BIANCA M JOYAL	X	